

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC., *et*
al.,

Plaintiffs,

V.

PHILIP D. MURPHY, in his official
capacity as Governor of New Jersey, *et
al.*,

Defendants.

HON. SUSAN D. WIGENTON, U.S.D.J.

HON. LEDA DUNN WETTRE, U.S.M.J.

CIVIL ACTION NO. 20-cv-03269

CIVIL ACTION

(ELECTRONICALLY FILED)

**DECLARATION OF SCOTT BACH IN SUPPORT OF
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING
ORDER AND/OR PRELIMINARY INJUNCTION**

1. I, Scott Bach, am Executive Director of Association of New Jersey Rifle & Pistol Club, Inc. (“ANJRPC”), a plaintiff in the above-titled action. I am

over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.

2. ANJRPC is a not for profit membership corporation, incorporated in the State of New Jersey in 1936 and represents its members. ANJRPC represents the interests of target shooters, hunters, competitors, outdoors people and other law-abiding firearms owners. Among the ANJRPC's purposes is aiding such persons in every way within its power and supporting and defending the people's right to keep and bear arms, including the right of its members and the public to purchase, possess, and carry firearms and ammunition. Executive Order 107's ("EO 107") ban on firearm and ammunition sales are thus a direct affront to ANJRPC's central mission.

3. ANJRPC has many thousands of members who reside in New Jersey , including numerous members who wish to purchase firearms and ammunition but are unable to do so because of EO 107 and the closure of the NICS background check portal, although they satisfy all other requirements for owning firearms and ammunition under New Jersey law. But for Defendants' enforcement of EO 107 and closure of the background check portal, those members would forthwith purchase firearms and ammunition. Likewise, ANJRPC has as a member club at least one licensed retail firearm business that is unable to sell firearms and ammunition because of EO 107 and the closure of the NICS background check portal. But for Defendants' continued enforcement of EO 107 and closure of the NICS background

check portal, that member club would forthwith engage in the retail sale of firearms and ammunition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed within the United States.

A handwritten signature in black ink, appearing to read "Scott L. Bach", with a long horizontal flourish extending to the right.

Scott Bach

March 26, 2020

Date